



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

April 6, 1989

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

Mr. Dean B. Ziegel
Rivkin, Radler, Dunne & Bayh
EAB Plaza
Uniondale, New York 11556

Dear Mr, Ziegel:

This letter is in response to your letter dated December 28, 1988 in which you ask for confirmation of a number of issues related to the financial responsibility requirements for petroleum underground storage tanks (USTs).

- A firm with more than \$20 million in tangible net worth that does not report to the Securities and Exchange Commission, Dun & Bradstreet, Energy Information Administration or the Rural Electrification Administration must comply with the financial responsibility requirements for petroleum USTs on October 26, 1990.
- A firm "reports" to Dun & Bradstreet if:
 - S the firm provides to Dun & Bradstreet information about the firm's net worth or information that can be used to determine the firm's net worth; or
 - S Dun & Bradstreet publishes a rating for the firm.

If you have any additional questions please call me at 202-382-7903.

Sincerely,

/s/

Sammy K. Ng, Chief
Regulatory Analysis Branch
Office of Underground Storage Tanks